

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-CR-20114-KMW**

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI

Defendant.

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**UNITED STATES' NOTICE OF INTENT UNDER FRE 902(13) TO OFFER CERTIFIED
RECORDS GENERATED BY AN ELECTRONIC PROCESS OR SYSTEM**

The United States of America, by and through undersigned counsel, respectfully provides notice that it intends, pursuant to Federal Rules of Evidence 902(13), to offer into evidence certified records generated by an electronic process or system. Previously, the government filed notice of its intent to offer into evidence certain documents from the Drousys System and requested that the Court take judicial notice as to the authenticity of those documents. DE 154. Following argument on April 3, 2024, the Court took judicial notice regarding the authenticity of the documents identified in the government's notice at DE 154. The government now seeks to introduce an additional document into evidence from the same Drousys System and has obtained a supplemental certification attesting that this document comes from the forensic copy of the Drousys System.

The Drousys System was an off-book communications system utilized by Odebrecht S.A.'s Division of Structured Operations. The government obtained a forensic copy of the Drousys System from Odebrecht S.A. Odebrecht S.A. hired Forensic Risk Alliance ("FRA"), a global market leader in regulatory compliance obligations, litigation, and multi-jurisdictional

investigations, through counsel, to forensically copy the Drousys System and ultimately provide forensic copies of the Drousys System to the government. A certification regarding the forensic copying of the Drousys System has already been provided to the Court at DE 154. The government now provides a certification regarding an additional document, attesting that this document, listed below, comes from that forensic copy. The government files this notice and requests the Court take judicial notice of the authenticity of the document identified in the certification and listed below:

3-9	DROUSYS_0003950268
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The United States respectfully requests leave to submit additional notifications.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CHIEF, FRAUD SECTION
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